

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND OVERNIGHT MAIL

January 2, 2018

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs' Executive Committee for Commercial Claims (PECC) writes to respectfully request a two-week extension for filing the PECC's brief concerning Judge Netburn's November 27, 2017 Report and Recommendation addressing the *Continental Casualty* Plaintiffs' motion to assess damages against Iran.

As Your Honor will recall, although the November 27, 2017 Report and Recommendation addresses only the interests of the *Continental Casualty* Plaintiffs in relation to their claims against Iran, the PECC felt that other commercial plaintiffs have potential interests in a few aspects of the Report and Recommendation. The PECC therefore sought an extension until January 11, 2018 to file a brief in relation to the Report and Recommendation on behalf of other commercial interests in the MDL.

As Your Honor also is aware, argument is scheduled on January 18 for the Motions to Dismiss of the Kingdom of Saudi Arabia, Saudi High Commission for Relief of Bosnia & Herzegovina, Al Rajhi Bank, National Commercial Bank, and Saudi Binladin Group. All of these defendants will be filing reply briefs between January 4 and January 11, 2018.

Given the substantial activity in the next two weeks relating to the upcoming argument on the numerous motions to dismiss, the PECC respectfully requests an additional two-week extension until January 25, 2018, to file their brief in relation to the November 27, 2017 Report

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and Recommendation. Again, as the Report and Recommendation concerns a default judgment against Iran, a party that has never appeared in this litigation, the proposed extension will not result in any delay in the broader MDL proceeding. The *Continental Casualty* Plaintiffs have confirmed that they consent to this request.

The PECC thanks Your Honor in advance for the Court's consideration of this request.

Respectfully,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "Sean P. Carter", with a stylized flourish extending to the right.

By: Sean P. Carter

SPC:bdw

cc: The Honorable Sarah Netburn (Via ECF & Federal Express)
All Counsel of Record (Via ECF)

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